

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
MICHELLE A. GOMBAR, AKA	:	
MICHELLE GOMBAR, AKA	:	
MICHELLE ANN GOMBAR,	:	
Debtor	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
vs.	:	
	:	
MICHELLE A. GOMBAR, AKA	:	
MICHELLE GOMBAR, AKA	:	
MICHELLE ANN GOMBAR,	:	
Respondent	:	CASE NO. 5-25-bk-00716-MJC

TRUSTEE’S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 23<sup>rd</sup> day of July 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Agatha R. McHale, Esquire, and objects to the confirmation of the above-referenced Debtor’s Plan for the following reason:

1. Debtor’s Plan violates 11 U.S.C. § 1332(b)(1) in that the Plan classifies unsecured claims but unfairly discriminates certain claims in the designation. More specifically, the Plan provides for payment of:

a. Cosigned debts/co-debtor claim is not a reason for special classification.

WHEREFORE, Trustee alleges and avers that Debtor’s Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/ Agatha R. McHale, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 23<sup>rd</sup> day of July 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Tullio DeLuca, Esquire  
Law Office of Tullio DeLuca  
381 North 9<sup>th</sup> Avenue  
Scranton, PA 18504

/s/ Derek M. Stroupbauer, Paralegal  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee